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2013 DEC 30 P 4: 06

BEFORE THE ARIZONA CORPORATION COMMISSION

ARIZONA CORPORATION COMMISSION
DOCKET CONTROL

IN THE MATTER OF THE APPLICATION
OF PAYSON WATER CO., INC., AN
ARIZONA CORPORATION, FOR A
DETERMINATION OF THE FAIR VALUE
OF ITS UTILITY PLANTS AND
PROPERTY AND FOR INCREASES IN ITS
WATER RATES AND CHARGES FOR
UTILITY SERVICE BASED THEREON.

DOCKET NO: W-03514A-13-0111

Arizona Corporation Commission

DOCKETED

DEC 30 2013

DOCKETED BY

IN THE MATTER OF THE APPLICATION
OF PAYSON WATER CO., INC., AN
ARIZONA CORPORATION, FOR
AUTHORITY TO: (1) ISSUE EVIDENCE
OF INDEBTEDNESS IN AN AMOUNT
NOT TO EXCEED \$1,238,000 IN
CONNECTION WITH INFRASTRUCTURE
IMPROVEMENTS TO THE UTILITY
SYSTEM; AND (2) ENCUMBER REAL
PROPERTY AND PLANT AS SECURITY
FOR SUCH INDEBTEDNESS.

DOCKET NO: W-03514A-13-0142

MOTION TO COMPEL DISCOVERY
PHASE 2

Kathleen M. Reidhead, "KMR", is an Intervener in the above-captioned matter. KMR is requesting that Jason Williamson be compelled to answer the questions posed in her Motion for Discovery filed on December 3, 2013. Payson Water Company, "PWC", has objected to questions 1, 2, 4, 5 and 6 and responded to questions 3 and 6. She is requesting that Judge Nodes overrule those objections, as she did not ask Payson Water Company to answer, she asked for Mr. Jason Williamson, President of PWC, to answer. Therefore, she is requesting a ruling on this matter at the pre-Hearing Conference scheduled for January 8, 2014 at 10:00 am.

Since the former owner of PWC, Brooke Utilities Inc., "BUI", was under the management of Mr. Robert Hardcastle prior to June 1, 2013 when a removal of assets is alleged to have occurred, KMR is asking for a full disclosure about Mr. Jason Williamson's relationship to him. KMR asserts the information requested in her Motion for Discovery is highly relevant to the rate case, as Mr. Williamson has adopted and is supporting the rate application originally submitted by Mr. Robert Hardcastle. In light of the disclosure of missing assets, which significantly alters the fair value of the

1 Company's utility property and impacts the setting of rates, it is important to know whether any
2 collusion exists.

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4 Respectfully submitted this 30th day of December, 2013.

5
6 By Kathleen M. Reidhead
7 Kathleen M. Reidhead, Intervener
8 14406 S. Cholla Canyon Dr.
9 Phoenix, AZ 85044

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12 **ORIGINAL** and thirteen (13) copies
13 of the foregoing were filed this 30th
14 day of December, 2013 with:

15
16 Docket Control
17 Arizona Corporation Commission
18 1200 W. Washington Street
19 Phoenix, AZ 85007

20
21 **COPY** of the foregoing was mailed
22 this 30th day of December, 2013 to:

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